



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

September 30, 2019

Blake Hazen
Wilco Distributors, Inc.
6832 N El Mirage Rd
Glendale AZ 85307

Subject: Addition of PF10 respirator to strychnine labels as required by the EPA letter dated July 19, 2019
Product Name: Wilco Gopher Getter AG Bait
EPA Registration Number: 36029-7
Application Date: 08/07/2019
Decision Number: 553960

Dear Mr. Hazen:

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable. This approval does not affect any conditions that were imposed on this registration. You continue to be subject to existing conditions on your registration and any deadlines connected with them.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. You must submit one copy of the final printed labeling before you release the product for shipment with the new labeling. You are permitted to sell or distribute products under the previously approved labeling for a period of 18 months from the date of this amendment. After this 18-month period, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

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Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6.

If you have any questions about this letter, please contact Srijana Shrestha by phone at 703-305-6471, or via email at shrestha.srijana@epa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Linda Arrington', with a stylized flourish at the end.

Linda Arrington, Branch Chief
Risk Management and Implementation Branch 4
Pesticide Re-Evaluation Division
Office of Pesticide Programs

Enclosure

ACCEPTED

Sep 30, 2019

Under the Federal Insecticide, Fungicide and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No. 36029-7

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
—DANGER—

Convulsive poison! Fatal if swallowed or inhaled. Harmful if absorbed through skin. Do not get in eyes, on skin or on clothing. Avoid contact with skin. Do not breathe dust. Do not apply this product in a way that will contact any person or pet. Wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Remove contaminated clothing and wash clothing before reuse.

PERSONAL PROTECTION EQUIPMENT (PPE)

Applicators and other handlers must wear:

*Long-sleeved shirt and long pants.

*Water proof gloves

*Shoes plus socks

*Wear a minimum of a NIOSH-approved particulate filtering facepiece respirator with any, R, or P filter; OR a NIOSH-approved elastomeric particulate respirator with any, R, or P filter; OR a NIOSH-approved powered airpurifying respirator with a HE filter.

Follow manufacturer's instructions for cleaning and maintaining PPE. If there are no such instructions for washables, use detergent and hot water. Keep and wash PPE separately from other laundry.

USER SAFETY RECOMMENDATIONS

Users should remove clothing immediately if pesticide gets inside. Then, wash thoroughly and put on clean clothing. Users should remove PPE immediately after handling this product. Wash the outside of waterproof gloves before removing them. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This product is toxic to fish, birds, and other wildlife. Do not allow bait to be exposed on soil surface. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water by cleaning of equipment or disposal of wastes.

ENDANGERED SPECIES RESTRICTIONS

NOTICE: The killing of a member of an endangered species during strychnine baiting operations may result in a fine under the Endangered Species Act. Before baiting, the user is advised to contact the Regional U.S. Fish and Wildlife Service (Endangered Species Specialist) or the local Fish and Game Office for specific information on endangered species. Strychnine baits should not be used in the geographic ranges of the following species except under programs and procedures approved by the U.S. EPA: San Joaquin kit fox, Morro Bay kangaroo rat, Salt Marsh Harvest mouse, gray wolf, and grizzly bear.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal. PESTICIDE STORAGE: Store only in original container, in a dry place inaccessible to children and pets, under lock and key in a posted storage area.

PESTICIDE DISPOSAL: Pesticide wastes are acutely hazardous. Improper disposal of excess pesticide, spilled bait, or rinsate is a violation of Federal Law. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

CONTAINER DISPOSAL: Nonrefillable container.

DO NOT REUSE OR REFILL CONTAINER.

Offer for recycling if available.

NOTICE: Seller makes no warranty, expressed or implied, concerning the use of this product other than indicated on the label. Buyer assumes all risk of use and/or handling, contrary to label instructions.

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RESTRICTED USE PESTICIDE
(DUETO HAZARD TO NONTARGET ORGANISMS)

For retail sale to and use only by Certified Applicators or persons under the direct supervision of a Certified Applicator, and only for those uses covered by the Certified Applicator's certification.



WILCO
GOPHER GETTER
AG
BAIT

ACTIVE INGREDIENT :

STRYCHNINE ALKALOID 0.50%
INERT INGREDIENTS 99.50%
TOTAL 100.00%

KEEP OUT OF REACH OF CHILDREN
DANGER-POISON
(PELIGRO)

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle. (If you do not understand this label, find someone to explain it to you in detail.)

FIRST AID

- IF SWALLOWED: CALL A PHYSICIAN OR POISON CONTROL CENTER IMMEDIATELY. If less than ten (10) minutes have passed since the poison was taken, give 1 or 2 glasses of water and induce vomiting by touching back of throat with finger. Repeat until vomit fluid is clear. Have patient lie down in a quiet, darkened room and keep warm and quiet. If person is unconscious, do not give anything by mouth and do not induce vomiting.
IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration. Get medical attention.
IF IN EYES: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.
IF ON SKIN: Wash with plenty of soap and water. Get medical attention

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-858-7378 (National Pesticide Information Center) for emergency medical treatment information.

NOTICE TO PHYSICIAN

- A. Administer 100% OXYGEN by positive pressure to provide as much pulmonary gas exchange as possible, despite seizures.
B. Administer ANTICONVULSIVE DRUGS intravenously to control convulsions.
NOTICE: It may be difficult or impossible to stop the seizure activity without stopping respiration. Be prepared to maintain pulmonary ventilation mechanically. Tracheotomy may be necessary if seizures are prolonged.

1LBS NET.WT. 5LBS
25LBS 50LBS

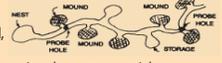
DIRECTIONS FOR USE
—POCKET GOPHERS—
FOR USE IN SUBSOIL ONLY

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

USE RESTRICTIONS: This product may only be used to control pocket gophers (Thomomys spp. and Geomys spp.) in subsoil applications (only) in rangeland, pastures, cropland, and nonagricultural areas. This product may be applied by use of tractor-operated mechanical burrow builders, by probe-assisted manual applications, or by use of manually operated bait-dispensing probes such as the Gopher Bait Applicator. Bait must be deposited directly into pocket gophers' natural underground runways or into artificial underground tunnels made by burrow builders. Do not broadcast bait over crops grown for food or feed, or any other purpose. Do not apply this product in a way that will contact workers, other persons, or domestic animals. Keep pets and other people out of the area during application.

APPLICATION DIRECTIONS FOR MANUAL BAITING:

LOCATING RUNWAYS: To locate a gopher's natural runway, probe about 6" to 8" from an active mound, beginning on the flat side of the horseshoe-shaped depression. Using an iron bar, a strong stick, a bait-dispensing probe, or other suitable implement, probe 8" to 10" below soil level. Soil resistance on the probe will decrease when runway is entered.



HAND APPLICATION:

Once the runway is located, enlarge probe hole (if necessary) to accommodate baiting. Drop a teaspoonful of bait through probe opening, taking care not to spill bait on the surface. Pick up any spilled bait immediately. Make 2-7 bait sets per burrow system, depending on the system's apparent length. Close probe holes as indicated below.

BAIT-DISPENSING PROBE APPLICATION:

Read manufacturer's instructions for the equipment selected for use. Determine how to calibrate equipment or otherwise ensure that each bait placement will be approximately one teaspoonful. Locate the main underground runway through probing, as indicated under LOCATING RUNWAYS. When probe is in the main runway, operate the dispenser to release bait into tunnel. Pick up or bury any spilled bait immediately. Make 2 to 7 bait sets per burrow system, depending upon the system's apparent length. Close probe holes as indicated below.

CLOSING PROBE HOLES: After bait placement has been made, cover opening with sod or dirt to close hole and exclude light. Do not permit dirt to sift in and cover bait.

TREATMENT RATE: Depending upon pocket gopher population levels, one pound of bait applied manually will treat one to eight acres.

APPLICATION DIRECTIONS FOR BURROW BUILDERS:

Burrow builders construct artificial underground tunnels and automatically place bait in them in a single operation. A couler disc opens the way for a subsoiler shank. At the bottom of the shank is a pointed tube or "torpedo." The torpedo creates the artificial burrow. Bait is dropped in preset quantities through an outlet in the rear underside of the torpedo. Close-set rubber tires behind the subsoiler shank close the cut above the burrow. Consult manufacturer's directions for the specific equipment to be used. Adjust the torpedo to the depth of pocket gopher runways. Make sure that soil is damp enough to hold formed tunnels. Cut artificial burrows at 20 to 25 foot intervals. Orient artificial burrows to intercept gophers' natural underground runways. Pick up or bury any spilled bait. One to three pounds of bait will treat one acre by the burrow-builder method. Apply at rates of one to three pounds of bait per acre.



WILCO DISTRIBUTORS, INC.

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EPA ESTABLISHMENT NO. 36029-AZ-01
EPA REGISTRATION NO. 36029-7